

I, Ronald Kuse, declare as follows:

1. My name is Ronald Kuse. I am over the age of twenty-one and am competent to make this declaration. The statements herein are based on my personal knowledge, in some cases based on review of corporate records. If called upon as a witness I could and would testify to their truth.

2. I am currently employed by Qualcomm Technologies, Inc. ("QTI"), which is a subsidiary of defendant Qualcomm Incorporated ("Qualcomm"). I work at QTI's corporate headquarters in San Diego, California. My title is Director, Engineering.


3. I am told that plaintiff DSS Technology Management, Inc. ("DSS") has alleged, among other things, that Qualcomm infringes U.S. Patent No. 5,965,924 and U.S. Patent No. 6,784,552 which allegedly relate to details regarding the structure resulting from the 20 or 28 nanometer process node employed to create the accused devices.

4. Qualcomm and QTI are Delaware corporations that each have their principal places of business in San Diego, California.

5. The engineers of Qualcomm or QTI with the most knowledge regarding the information those foundries share about their respective processes are located in San Diego and overseas offices.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on Feb 23, 2016.



Ronald Kuse
Director, Engineering
Qualcomm Technologies, Inc.